

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

Frank Staples, et al.,
Plaintiffs,

v.

Christopher Sununu, Governor, et al.,
Defendants.

Civil No.: 1:24-cv-00331-LM-TSM

DISTRICT OF NH
FILED

2025 MAR 24 P 8:16

24 HOUR DEPOSITORY

**NOTICE OF REQUEST FOR ADA ACCOMMODATION AND SUPPORTING
AFFIDAVIT**

NOW COME the Plaintiffs, Frank Staples and Kathleen Bussiere, pro se, and respectfully submit this Notice of Request for ADA Accommodation and Supporting Affidavit pursuant to Fed. R. Civ. P. 5 and 83, and in accordance with the Americans with Disabilities Act (ADA), 42 U.S.C. § 12101 et seq.

Plaintiff Frank Staples, appearing pro se, respectfully requests that the Court take into consideration his cognitive impairments, including memory issues and head trauma, which materially affect his ability to manage court filings, deadlines, and procedural compliance. As a result of these conditions, Plaintiff may at times submit filings that are duplicative in appearance, contain staggered arguments, or require supplemental clarification. This request is made in good faith and without intent to burden the Court or Defendants.

REQUEST FOR SPECIFIC RELIEF

Plaintiffs respectfully request that the Court formally recognize the cognitive impairments described herein as a basis for:

1. **Liberal construction** of Plaintiffs' filings where overlapping, duplicative, or staggered submissions may arise from limitations in memory, attention, or cognitive processing;
2. **Reasonable flexibility in deadlines** or requests for extensions when impairments interfere with timely and complete filing of materials;

3. **Permission to file supplemental or corrective submissions** where information is inadvertently omitted or clarified later due to cognitive limitations;
4. **Recognition that filings may contain repeated or overlapping assertions** due to challenges in consolidating and sequencing arguments under pressure;
5. **Assurance that ADA-related requests and effects will not be construed as noncompliance or abuse of process.**

Plaintiffs do not seek any special treatment or unfair advantage, only equal access to the courts as guaranteed under the ADA and the Fourteenth Amendment. This limited accommodation is narrowly tailored to ensure a fair adjudication on the merits without prejudice to Defendants or disruption to judicial efficiency.

AFFIDAVIT OF FRANK STAPLES IN SUPPORT OF ADA REQUEST

I, Frank Staples, under penalty of perjury pursuant to 28 U.S.C. § 1746, hereby declare the following to be true and correct to the best of my knowledge:

1. I am a named Plaintiff in the above-captioned action and submit this affidavit in support of my request for reasonable accommodation under the Americans with Disabilities Act.
2. I suffer from diagnosed head trauma and neurological conditions that impact my cognitive functioning, including memory recall, concentration, and information processing.
3. These conditions significantly interfere with my ability to consolidate and organize legal arguments, and at times lead me to file submissions in a staggered or overlapping manner.
4. I am doing my best, in good faith, to meet all court deadlines and procedural rules, but my impairments may result in submissions that are fragmented or duplicative in part.
5. I ask the Court to take my limitations into account and to apply liberal construction to my filings consistent with the rights of pro se litigants, and to permit supplementation or clarification of materials where reasonably necessary.
6. I do not request an indefinite extension or blanket exemption from procedural requirements. I only ask for reasonable consideration of my medical condition in interpreting my filings, and in allowing sufficient time to respond as needed.

7. This request is submitted in good faith and is not intended to delay or burden these proceedings.

Respectfully submitted,

/s/ Frank Staples (Electronic Signature)

332 Merrimack Street

Manchester, NH 03103

(603) 722-5408

Absolutedefiance@protonmail.com

A handwritten signature in black ink, appearing to be 'F Staples', with a stylized flourish extending from the end.

Dated: March 24, 2025

CERTIFICATE OF SERVICE

I hereby certify that on this March 24, 2025, a true and correct copy of the foregoing Plaintiffs' Notice of Discovery Requests, along with Exhibit A, was filed electronically via the Court's CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Frank Staples (Electronic Signature)

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